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December 23, 2024

Via ECF Hon. Eric R. Komitee United States District Court Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Natalya Ivanovna Mazulina Case No. 24-cr-493 (ERK)

## Dear Judge Komitee:

I have been retained to represent Natalya Mazulina in the above-referenced matter. Ms. Mazulina was initially arrested and appeared in the Western District of Washington pursuant to Fed. R. Crim. P. Rule 5 at a hearing, was released on bail pursuant to an appearance bond, and was directed to appear in the Eastern District of New York ("EDNY") for her arraignment before Your Honor on January 6, 2025. A special condition of her bond is that she may not have any contact (direct or indirect) "with any existing and/or future witnesses in this case." The charges in this matter relate to allegations involving actions undertaken by Ms. Mazulina during her work as an employee of Delex, a freight forwarding logistic company. Ms. Mazulina's sister, Oksana Shneyder, and her niece, Julya Schneyder, also work at Delex, and thus are potential witnesses and/or co-defendants in this matter. I am writing to respectfully request a temporary bail modification that would permit Ms. Mazulina to associate with and speak to her sister and niece during the holidays, as the family will be together from Christmas through New Year's (December 25, 2024, through January 1, 2025). We, of course, will counsel Ms. Mazulina not speak to her sister or niece about anything whatsoever having to do with the case.

I spoke to Chandra Wageman, Ms. Mazulina's Pretrial Services officer in the Western District of Washington, who takes no position regarding this request and defers to Pretrial Services in the EDNY and the Government. We reached out to the Pretrial Office in EDNY, and were informed that there is currently no assigned Pretrial Services officer to this matter, however, they provided us with a general intake email. We submitted our bail modification request to this email earlier today and have not yet received a response. We also reached out to the AUSAs listed on the case and were informed via email that AUSA Artie McConnell is out of the office until January 6, 2025. We have not heard back from AUSA Christopher M. Rigali, who we also emailed earlier today.

Therefore, although we have not been able to obtain a position of either Pretrial or the Government, in light of the pendency of the holiday, we are submitting this request to the Court for the modification sought.

Your Honor's time and consideration of this matter is greatly appreciated.

Respectfully Submitted,

Lorraine Gauli-Rufo, Esq. Attorney for Natalya Ivanovna Mazulina

cc: Artie McConnell, AUSA Christopher M. Rigali, AUSA Chandra Wageman, PTSO of Western District of Washington Intake Unit, Pretrial Services of the Eastern District of New York